

UNITED STATES OF AMERICA  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Service Performance Dashboard

Docket No. PI2022-2

**COMMENTS OF THE ASSOCIATION FOR POSTAL COMMERCE**  
(March 18, 2022)

Pursuant to Order No. 6104, the Association for Postal Commerce (“PostCom”) submits these comments on the Commission’s planned effort to produce a service performance dashboard. PostCom commends the Commission’s effort to “promote transparency by making its public data more accessible and usable.” Order No. 6104 at 1. While the Postal Service amasses—and the Commission collects—voluminous data on the performance of the Postal Service, that information, in many cases, is difficult to access for those who are not expert in Commission proceedings. Further, data provided by the Postal Service is generally presented in formats bound by custom and an understandable effort to comply with Commission directives while minimizing extraneous effort and expense. Unfortunately, the result is reporting that is opaque, often stale, and lacking in important contextual information that would aid interpretation. Improvements in how performance data are compiled and presented would benefit the Commission, the Postal Service, and the public at large.

PostCom’s members are generally commercial mailers and shippers and their suppliers. Because of their economic dependence on the Postal Service, they have developed sophisticated tools and techniques for measuring service performance that far surpass what is available via the official reports provided by the Commission’s current practices. The following comments are predicated on the belief that the Commission’s dashboard ought to aspire to provide the same

degree of transparency and clarity except where bound by a legal obligation to shield information that would identify an individual postal customer's mail.

PostCom also notes that the recently passed Postal Service Reform Act of 2022 recognizes some of the deficiencies with current service performance reporting and requires the Postal Service to develop and maintain a public performance dashboard meeting specified criteria. While this Postal Service dashboard is a welcome development, the legislation does not relieve the Commission of its oversight responsibilities, and the Commission should continue to develop its own dashboard targeted to the needs of the public and the Commission's responsibilities.

### **Greater Transparency Is Possible and Necessary**

The OPEN Government Data Act cited by the Commission specifies that the data of federal agencies should be "open" as a default proposition. Order No. 6104 at 3; *see also* Pub. Law. 115-435, 132 Stat. 5534 at 5535. The service performance reporting conducted by the Postal Service, and presented to the Commission, is anything but. Almost a third of mail is absent from reporting due to business rules, imposed by the Postal Service, that ultimately distort service measurement and present an unrealistically rosy picture of Postal Service performance. In addition to the specific improvements in granularity described below, it is imperative that the Commission acquire and share unedited service data. While the Postal Service may claim that business rules are required to "validate" mail for measurement, the Commission's dashboard could—and should—provide sufficient clarification to enable users of the system to make reasonable inferences regarding measurements based on edited versus raw data. Utilization of raw data would also presumably reduce the lag in reporting acknowledged by the Commission in its Order. *See* Order No. 6104 at 2.

Virtually all commercial mail presented to the Postal Service is barcoded. Moreover, at the time of acceptance, mailers provide detailed information on the contents of mailings including address information, service type indicators, postage rates, mail preparation, and containerization. Consequently, every mail piece bears a unique license plate that enables detailed tracking from before the piece is received by the Postal Service until it is delivered to the recipient.

Compared with the beta version of the Commission's dashboard, which is product-based and highly aggregated, PostCom suggests that greater depth in reporting is possible, and that the Commission should present disaggregated service performance information to include:

- Performance below the product level based on service type indicators
- Performance based on specific 3-Digit origin-destination pairs
- Performance by entry facility
- Performance by day of entry

The same disaggregation should be applied to pieces that USPS excludes from measurement. The data required to enable this level of reporting is already available, and including it in the dashboard ought therefore require minimal effort or expense. In addition to greater granularity, reporting should be more frequent; weekly at a minimum.

In addition, the Commission's dashboard would be improved by providing greater contextual information for comparison purposes. In its beta form, the Commission dashboard shows only two time periods and a target set arbitrarily by the Postal Service for each product. As the last three years have demonstrated, perception of year-over-year changes will almost certainly be influenced by the base period, which may include anomalous events like a

pandemic. Targets, as indicated above, are arbitrarily chosen and may obscure underlying changes in standards.

To address this problem of “shifting baselines” and make the dashboard less prone to misinterpretation, the Commission should enable comparisons over longer time horizons to the extent that the data permits. PostCom acknowledges that there may be resource constraints limiting presentation of historical data.

PostCom does not propose that the Commission eliminate presentation of service performance targets at the highly aggregated levels at which they are set. However, while targets may provide helpful contextual data, they change over time, are prone to manipulation, and may therefore occlude understanding of whether service is “good” or “improving.” PostCom proposes that the Commission supplement evaluating service relative to targets by reporting average days to delivery at the levels of specificity identified above. Recently, the Postal Service has begun utilizing this metric in its public pronouncements on service performance. If the underlying data are exhaustive and unredacted (see above), this could be a useful measurement that has the benefit of being stable over time and amenable to refinement. For example, in addition to a raw average days to deliver, the Commission could consider visually presenting dispersion around the mean as an indicator of consistency, or lack thereof.

### **Presentations of Non-service Data**

Apart from service measurement, PostCom believes that much of the data already provided by the Postal Service could be presented in more usable formats. In general, any report filed by the Postal Service should facilitate tracking over time. For example, the Revenue Pieces and Weight (“RPW”) reports offer only comparisons with one year prior. The public version of the Cost and Revenue Analysis (“CRA”) report offers only a single-year snapshot of unit costs.

The Commission's goal should be to enable time series analysis of all relevant financial and performance indicators by compiling data over time. For example, the monthly financial performance reports filed by the Postal Service contain useful information on delivery points, mail volume, employment levels, and various cost categories. Unfortunately, these reports are filed in PDF format and are therefore useless for tracking movement over time. Granted, the underlying data are often provided in other formats in other reports, *e.g.*, On-Roll and Paid Employee Statistics (ORPES) reports. But that is symptomatic of the problem that the Commission is trying to confront in this proceeding. Usable data is often fragmented and presented in ways that are challenging for interested parties to use.

### **Data Formats and Users**

The beta version of the Commission's dashboard allows users to download underlying data in csv format. As a general rule, the Commission should allow unrestricted access to downloadable electronic data in similar format to the extent possible. As the Commission's Order anticipates, some stakeholders may prefer bulk access via an Application Programming Interface (API). From PostCom's perspective, commercial mailers can avail themselves of service data already and would not require API access. On the other hand, academics or analysts reviewing postal performance may find such formats helpful. PostCom cautions however, that the Commission take care in providing such access so that it not intrude on the commercial interests of software companies that may already be providing comparable services. With regard to API access to non-service data, PostCom recommends that the Commission balance the expected utility to users with the time and effort required to provide such access.

## Summary

PostCom appreciates the focus that the Commission has brought to this important topic and believes that improved reporting would produce substantial benefits to the postal system without a significant expenditure of resources. However, a thorough and thoughtful reexamination of Commission reporting is likely to be an iterative process for which the formal notice and comment format typically used by the Commission may be an imperfect fit. Order No. 6104 is silent with respect to how this proceeding will unfold after reply comments. As the Commission pursues this public inquiry, we encourage utilization of less formal processes to facilitate greater participation and clarity.

Respectfully submitted,

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